

EXHIBIT I

10:34AM 1 WHETHER WISCONSIN IS A FILE, BECAUSE I SAW IT AS A FILE,
10:34AM 2 IS THAT A FILE, AN EXCEL SPREADSHEET, AND/OR A WORKSTATION?
10:34AM 3 A. SOMETHING -- TO USE WISCONSIN AS AN EXAMPLE, THERE WAS A
10:34AM 4 MACHINE THAT WAS CALLED WISCONSIN. THEY ACTUALLY HAD A LABEL
10:34AM 5 ON IT. THIS PARTICULAR MACHINE IS CALLED WISCONSIN, AND THIS
10:34AM 6 MACHINE IS ATTACHED TO THIS ONE DNA SEQUENCER. THAT WAS ITS
10:34AM 7 PURPOSE IN LIFE.

10:34AM 8 Q. OKAY.

10:34AM 9 A. WHEN THE FORENSIC IMAGE COPIES WERE CREATED, THEY WERE
10:34AM 10 GIVEN A NAME, AND IN THIS CASE THERE'S ONE CALLED WISCONSIN,
10:34AM 11 WHICH IS THE EXTRACTED CONTENT FROM THAT ONE COMPUTER.

10:34AM 12 BUT ALL OF THESE COMPUTERS WERE NETWORKED TOGETHER. YOU
10:34AM 13 COULD MOVE DATA AROUND ON ANY OF THEM VIA THEIR NETWORK.

10:34AM 14 Q. AND ANYONE WITH ACCESS TO THAT NETWORK COULD MOVE DATA
10:34AM 15 AROUND; RIGHT?

10:34AM 16 A. ASSUMING THEY HAD SUFFICIENT PRIVILEGES AND ACCESS, YES.

10:34AM 17 Q. WHAT'S THE DIFFERENCE BETWEEN A NETWORK AND A SERVER?

10:34AM 18 A. A NETWORK IS A CONNECTIVITY BETWEEN THEM. A SERVER IS A
10:35AM 19 PLACE WHERE THINGS ARE STORED.

10:35AM 20 Q. WAS THIS TYPE OF SERVER THAT YOU STUDIED HIGHLY PROTECTED
10:35AM 21 AND ENCRYPTED EVEN?

10:35AM 22 A. UM, NONE OF THE SERVERS -- I SHOULDN'T SAY NONE. THERE
10:35AM 23 WAS ONE IMAGE THAT I WAS PROVIDED WHICH WAS ENCRYPTED, WHICH
10:35AM 24 BECAME PROBLEMATIC AND CONFUSED EVERYBODY, AND EVENTUALLY THEY
10:35AM 25 GAVE ME A NON-ENCRYPTED VERSION OF IT WITH NO EXPLANATION AS TO

10:35AM 1 WHY.

10:35AM 2 BUT FOR THE MOST PART, NONE OF THIS INFORMATION WAS
10:35AM 3 ENCRYPTED.

10:35AM 4 WHAT OTHER PHYSICAL PROTECTIONS THERE MAY HAVE BEEN,
10:35AM 5 WHETHER IT'S A LOG-ON PASSWORD OR A LOCK ON THE DOOR, THAT
10:35AM 6 WOULD GO TO THE FACILITY THEMSELVES AND YOU WOULD HAVE TO TALK
10:35AM 7 TO THEM ABOUT THAT.

10:35AM 8 Q. SO OF THE MILLIONS OF PIECES OF DATA THAT YOU RECEIVED,
10:35AM 9 JUST ONE FILE WAS ENCRYPTED AND EVERYTHING ELSE WAS NOT
10:35AM 10 ENCRYPTED; RIGHT?

10:35AM 11 A. NO. ONE OF THE FORENSIC IMAGED COPIES THAT I RECEIVED
10:36AM 12 CREATED BY THE OPPOSING EXPERT, THAT WAS ENCRYPTED. THAT WAS A
10:36AM 13 CREATION OF THAT INDIVIDUAL. THAT WAS NOT SOMETHING THAT
10:36AM 14 EXISTED WITHIN THE -- QUINTARA'S OFFICE SPACE.

10:36AM 15 Q. SO WHAT WERE EXAMPLES OF THE NON-ENCRYPTED INFORMATION
10:36AM 16 THAT YOU RECEIVED?

10:36AM 17 A. EVERYTHING ELSE.

10:36AM 18 Q. FOR EXAMPLE, LIKE WHAT? CAN YOU NAME IT? CAN YOU BE MORE
10:36AM 19 SPECIFIC?

10:36AM 20 A. WELL, WHAT I RECEIVED WERE THE FORENSIC IMAGE COPIES, THE
10:36AM 21 EXTRACT FOR EACH MACHINE.

10:36AM 22 SO, FOR EXAMPLE, FOR INSTANCE, I RECEIVED A DATA SET
10:36AM 23 CALLED WISCONSIN, WHICH WAS EVERYTHING THAT WAS ON WISCONSIN.

10:36AM 24 Q. AND WAS THAT ENCRYPTED?

10:36AM 25 A. NO. YOU KNOW, IT'S THE SAME WITH WORKSTATION_2,

10:36AM 1 WORKSTATION_3, ALL OF THOSE --

10:36AM 2 Q. WERE THEY ENCRYPTED?

10:36AM 3 A. THEY WERE NOT.

10:36AM 4 Q. DID THEY HAVE ANY KIND OF MULTI-FACTOR AUTHENTICATION LOG
10:36AM 5 ON? COULD YOU TELL? OR TWO FACTOR LOG ON TYPE OF CREDENTIAL
10:36AM 6 LOG IN?

10:36AM 7 A. I SAW NO EVIDENCE OF TWO FACTOR IDENTIFICATION.

10:36AM 8 Q. YOU ACTUALLY INVESTIGATE FOR THAT AND YOU DID NOT SEE
10:37AM 9 THAT?

10:37AM 10 A. I DID NOT SPECIFICALLY INVESTIGATE THAT. IF THAT HAD BEEN
10:37AM 11 AN ISSUE, IT PROBABLY WOULD HAVE BEEN SOMETHING THAT WOULD HAVE
10:37AM 12 BEEN APPARENT TO ME.

10:37AM 13 I DID NOT REQUIRE ANY OF THAT TO VIEW OR ACCESS ANY OF THE
10:37AM 14 DATA THAT I DID.

10:37AM 15 Q. BUT EVEN SOMETHING AS BASIC AS TWO FACTOR AUTHENTICATION
10:37AM 16 THAT COULD HAVE BEEN APPARENT TO AN EXPERT LIKE YOU, YOU COULD
10:37AM 17 NOT FIND THAT IN ANY OF THESE DOCUMENTS AND FORENSIC IMAGING
10:37AM 18 FILES THAT YOU RECEIVED; RIGHT?

10:37AM 19 A. SOMETHING LIKE TWO FACTOR AUTHENTICATION HAS TO BE
10:37AM 20 CONFIGURED FOR ACCESS EITHER TO A SYSTEM OR A FILE OR
10:37AM 21 SOMETHING -- SOME INDIVIDUAL WAY TO PROTECT SOME PIECE OF
10:37AM 22 INFORMATION.

10:37AM 23 I SAW NO EVIDENCE THAT ANY OF THIS INFORMATION HAD TWO
10:37AM 24 FACTOR AUTHENTICATION ACCESS ENABLED.

10:37AM 25 Q. DID YOU FIND OR LOOK FOR ANY KIND OF JUST SIMPLE BASIC

10:37AM 1 PASSWORD LOG IN ON ANY OF THE FILES THAT YOU RECEIVED?

10:37AM 2 A. I DID NOT.

10:37AM 3 Q. SO WHAT I GATHERED WAS THERE'S NO TWO FACTOR

10:38AM 4 AUTHENTICATION ON ANY OF THESE FORENSIC IMAGING FILES, THERE'S

10:38AM 5 NO SIMPLE BASIC PASSWORD PROTECTION ON ANY OF THESE FORENSIC

10:38AM 6 IMAGING FILES, AND OUT OF ALL OF THE FORENSIC IMAGING FILES

10:38AM 7 THAT YOU RECEIVED, THERE WAS ONE ENCRYPTED, EVERYTHING ELSE WAS

10:38AM 8 NON-ENCRYPTED, AND THAT ONE ENCRYPTED WAS BECAUSE THE

10:38AM 9 INDIVIDUAL ENCRYPTED IT AND THAT'S HOW YOU RECEIVED IT; RIGHT?

10:38AM 10 A. THERE'S AN IMPORTANT DISTINCTION IN YOUR QUESTION BETWEEN

10:38AM 11 WERE THE FORENSIC IMAGES PROTECTED OR ENCRYPTED IN SOME WAY, OR

10:38AM 12 WAS THE DATA WITHIN QUINTARA'S OFFICE SPACE ENCRYPTED OR

10:38AM 13 PROTECTED?

10:38AM 14 Q. WELL, YOU TOLD ME YOU NEVER VISITED QUINTARA'S OFFICE

10:38AM 15 SPACE AND/OR RUIFENG'S OFFICE SPACE OR ANY OTHER OFFICE SPACE,

10:38AM 16 YOU JUST RECEIVED THE HARD DRIVE; RIGHT?

10:38AM 17 A. RIGHT.

10:38AM 18 Q. WELL, I'M NOT ASKING ABOUT OFFICE SPACE ENCRYPTION.

10:38AM 19 I'M ASKING ABOUT THE FORENSIC IMAGING FILES YOU RECEIVED.

10:38AM 20 YOU STATED THAT THERE WAS NO SIMPLE BASIC PASSWORD AND THERE

10:39AM 21 WAS NO TWO FACTOR AUTHENTICATION, AND OUT OF THE ALL OF THE

10:39AM 22 FORENSIC IMAGING FILES, THERE WAS ONE ENCRYPTED BECAUSE THE

10:39AM 23 INDIVIDUAL SAVED IT AS SUCH, AND EVERYTHING ELSE WAS

10:39AM 24 NON-ENCRYPTED, ONLY WITHIN THE SCOPE OF THE FORENSIC IMAGING

10:39AM 25 FILES THAT YOU RECEIVED?

10:39AM 1 A. CORRECT.

10:39AM 2 Q. OKAY.

10:39AM 3 NO FURTHER QUESTIONS, YOUR HONOR.

10:39AM 4 THE COURT: REDIRECT?

10:39AM 5 MS. RIDER: JUST A FEW QUESTIONS FOR YOU.

10:39AM 6 **REDIRECT EXAMINATION**

10:39AM 7 BY MS. RIDER:

10:39AM 8 Q. AGAIN, WE WERE TALKING ABOUT ENCRYPTION; RIGHT?

10:39AM 9 A. YES.

10:39AM 10 Q. AND WE WERE TALKING ABOUT TO THE EXTENT THAT YOU
10:39AM 11 INVESTIGATE ENCRYPTION, RIGHT?

10:39AM 12 A. YES.

10:39AM 13 Q. AND AGAIN, ALL OF THESE DOCUMENTS THAT YOU RECEIVED WERE
10:39AM 14 PROVIDED BY DEFENDANTS' EXPERT; RIGHT?

10:39AM 15 A. YES.

10:39AM 16 Q. AND SO YOUR SCOPE OF INVESTIGATION WAS LIMITED TO WHAT YOU
10:39AM 17 WERE PROVIDED BY DEFENDANTS' EXPERT; RIGHT?

10:39AM 18 A. CORRECT.

10:39AM 19 Q. AND WE ESTABLISHED ALREADY THAT THE RF BIO_SERVER IN
10:39AM 20 PARTICULAR WAS CREATED AFTER THE LOCKOUT; CORRECT?

10:40AM 21 A. YES.

10:40AM 22 Q. AND SO IT WAS, IF I RECALL CORRECTLY, YOU TESTIFIED
10:40AM 23 MAY 18, 2020; CORRECT?

10:40AM 24 A. APPROXIMATELY TWO MONTHS --

10:40AM 25 THE COURT: DO YOU NEED A BREAK OVER THERE?